

LUGAIA

Containment Solutions



Code of Conduct

Version 4.1

22.05.2025

Foreword

At Lugaia, our commitment to ethical business practices is at the heart of everything we do. As a company, we believe that our long-term success is built on a foundation of integrity, responsibility, and respect for people and the planet. This **Code of Conduct** serves as a guiding document for our employees, partners, and stakeholders, outlining the principles that define how we operate, the values we uphold, and the standards we expect from ourselves and our business relationships.

Our Code of Conduct is not just a set of rules; it is a reflection of our core belief that sustainable growth can only be achieved through ethical conduct and responsible management. We are dedicated to upholding the highest standards in human rights, labor practices, environmental sustainability, anti-corruption and occupational health and safety. This Code aligns with the **Principles of the United Nations Global Compact**, which Lugaia proudly supports and integrates into our daily operations.

We ask all Lugaia employees and partners to familiarize themselves with this Code and commit to its principles. By doing so, we ensure that we act with integrity in every decision we make, every action we take, and every interaction we have.

Thank you for your dedication to upholding the values that define Lugaia and for contributing to our shared mission of building a sustainable and ethical future for all.

The Executive Board, Lugaia AG



Michael Schweizer



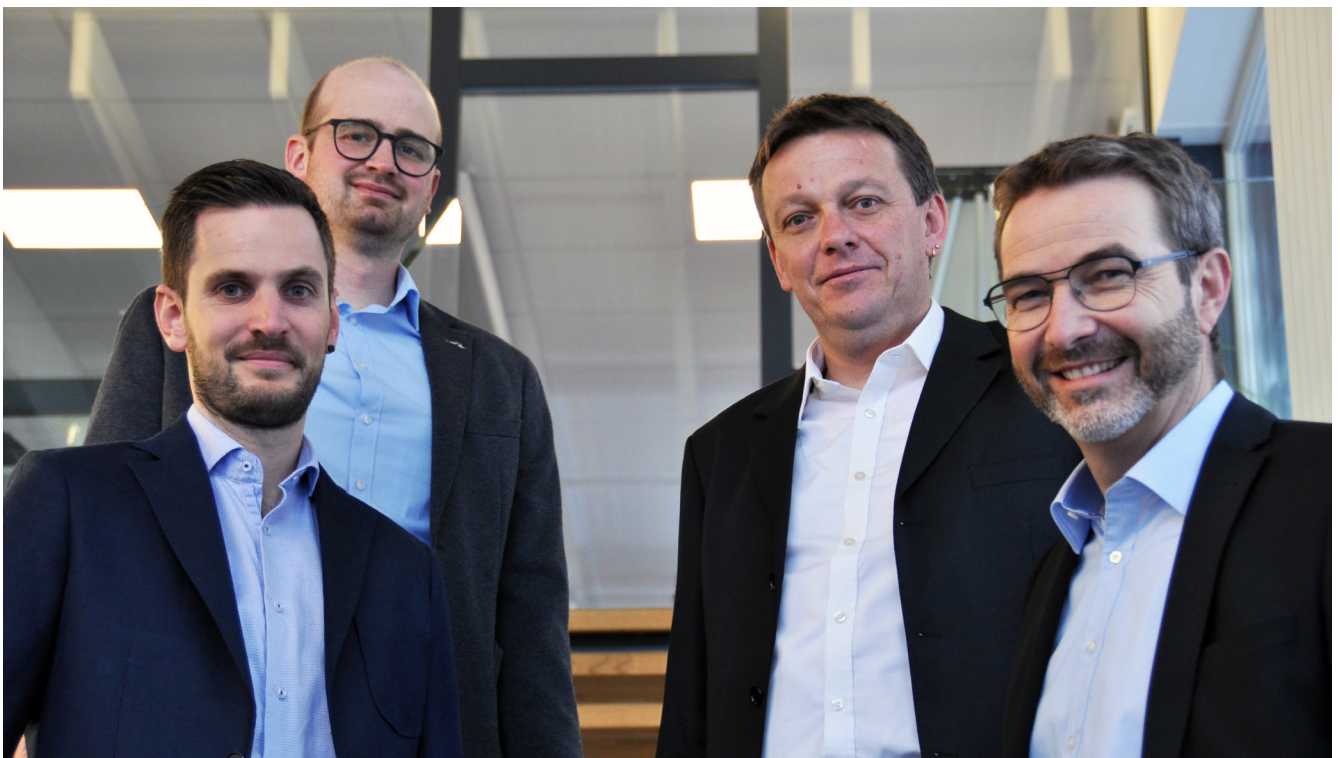
Samuel Meichtry



Daniel Lochmatter



Viktor Schnyder



Code of Conduct

At Lugaia, we are fully committed to operating in accordance with the **Principles of the UN Global Compact**. These principles guide our approach to human rights, labor, the environment, and anti-corruption, ensuring that we not only comply with international standards but also foster a culture of integrity, responsibility, and sustainability in all areas of our business.

1. Human Rights

Lugaia is dedicated to respecting and protecting human rights in all our business operations. This commitment is grounded in the Universal Declaration of Human Rights.

Principle 1: We support and respect the protection of internationally proclaimed human rights. We ensure that our policies and actions do not infringe on the rights of any individual, whether employee, business partner, or community member.

Principle 2: Lugaia is committed to ensuring that we are not complicit in human rights abuses, either directly or through our business relationships. We take steps to prevent any such involvement throughout our supply chain.

2. Labour Standards

Lugaia upholds the highest standards for labor practices, aligning with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Principle 3: We uphold the freedom of association and recognize the right to collective bargaining. Lugaia employees are free to form and join unions and to engage in collective negotiations without fear of discrimination or retaliation.

Principle 4: We strictly prohibit all forms of forced or compulsory labor. No employee should be coerced into work against their will, and we ensure that our supply chain adheres to the same standard.

Principle 5: We are committed to the effective abolition of child labor. Lugaia enforces minimum age requirements in accordance with international standards and local laws, ensuring that no child is employed in our operations and our supply chain.

Principle 6: We are dedicated to eliminating discrimination in employment and occupation. Every employee, regardless of race, gender, ethnicity, religion, disability, sexual orientation, or age, is treated with respect and given equal opportunities to succeed.

3. Environment

Lugaia takes a precautionary approach to environmental challenges, promoting sustainable development and environmental responsibility throughout our operations.

Principle 7: We support a precautionary approach to environmental challenges by identifying and mitigating environmental risks before they cause harm.

Principle 8: Lugaia undertakes initiatives to promote greater environmental responsibility. We are committed to reducing our ecological footprint and fostering sustainable practices in our production and supply chains.

Principle 9: We actively encourage the development and use of environmentally friendly technologies. Lugaia continually invests in research and innovation to minimize our environmental impact and enhance the sustainability of our products and services.

4. Anti-Corruption

Lugaia maintains a zero-tolerance policy toward corruption in all its forms, including extortion and bribery, in line with the United Nations Convention Against Corruption.

Principle 10: We work against corruption in all its forms, including extortion and bribery. Lugaia enforces stringent anti-corruption policies, and all employees are required to act with integrity in all business dealings. We hold our suppliers and business partners to the same standard, ensuring transparency and honesty across all levels of our operations.

5. Health and Safety

Lugaia is committed to the highest standards in occupational health and safety. Leaders take responsibility, lead by example when it comes to safety awareness, and actively support their employees in implementing all safety measures.

Principle 11: We promote a balanced work-life balance and strengthen the health and motivation of our employees through flexible working time models, regular job rotation, and free sports offerings.

Principle 12: We offer our employees safe workplaces and take all necessary measures to minimize risks in order to prevent accidents and health hazards.

Compliance and Responsibility

Lugaia's commitment to these principles is fundamental to our long-term success. Each employee, business partner, and supplier is expected to uphold these values in every aspect of their work. We encourage reporting any violations or concerns regarding the Code of Conduct without fear of retaliation. By embedding the UN Global Compact's principles into our corporate culture, we contribute to a sustainable future while maintaining the highest ethical standards in our business practices.

Contact Person

We actively promote the communication of the values and regulations on which this code of conduct is based. We encourage our employees to address issues and problems openly. Employees who express concerns with respect to processes within the company in good faith will therefore not be subject to any disadvantages.

Our managers have a special role model function and are the first points of contact for questions concerning an understanding of the regulations. In the context of their management tasks, they prevent unacceptable behavior or implement suitable measures to prevent or cease violations of the regulations in their area of responsibility.

Employees and business partners should feel free to contact the Lugaia compliance officer if they have any questions concerning this code of conduct or information regarding violations of laws or guidelines. All information will, of course, be treated confidentially. Our internal compliance officer can be contacted as follows:

Adrian Kohler

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Thank you for your commitment to upholding the Lugaia Code of Conduct.

